

**Appl. No.** : **10/741,308**  
**Filed** : **December 19, 2003**

### **REMARKS**

In the Office Action mailed June 23, 2005, the Examiner objected to the numbering of claims 57-68 due to claim 56 being left out inadvertently. The Examiner also objected to the specification for use of the term "velcro." The Examiner also rejected claims 1, 5-10, 15-17, 36-38, 43-48, 51, 53-58, 60, 60, and 63-67 under 35 U.S.C. 102(e) as being anticipated by Matsuyama et al. (U.S. Patent No. 6,767,282, "Matsuyama"). The Examiner also rejected claims 42, 52, and 62 under 35 U.S.C. 103(a) as being unpatentable over Matsuyama. The Examiner also rejected claims 2-4, 11, 12, 20-30, 33, and 34 under 35 U.S.C. 103(a) as being unpatentable over Matsuyama in view of Woolston (U.S. Patent No. 6,162,123). The Examiner also rejected claims 13, 14, 31, 32, 39, 40, 49, 50, and 59 under 35 U.S.C. 103(a) as being unpatentable over Matsuyama in view of Yasue et al. (U.S. Patent No. 6,189,053, "Yasue"). The Examiner also rejected claims 18 and 35 under 35 U.S.C. 103(a) as being unpatentable over Matsuyama in view of Childs et al. (U.S. Patent No. 5,623,545, "Childs"). The Examiner also rejected claim 19 under 35 U.S.C. 103(a) as being unpatentable over Matsuyama in view of Lum et al. (U.S. Patent Application Publication No. 2004/0224763 A1, "Lum"). By this paper, Applicant addresses the foregoing issues raised by the Examiner.

#### **Numbering of Claims 57-68 to 56-67**

Applicant thanks the Examiner for pointing out the error in the omission of claim 56. Applicant has renumbered claims 57-68 to 56-67, and has made appropriate corrections to the claim-dependency numbering, to be consistent with the "RE-NUMBERED CLAIMS" issued by the Examiner. In this paper, the re-numbered form is used.

#### **Notice of Draftperson's Patent Drawing Review**

Applicant respectfully requests that the objections to the drawings be held in abeyance until the submission of formal drawings, since the substance of the Examination is generally not affected by the objected portions of the drawings.

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### **Amendment to the Specification**

Applicant has amended the specification to address the use of the term “Velcro.” No new matter is being added by this amendment to the specification.

### **Rejections Under 35 U.S.C. 102(e) Based on Matsuyama**

In the Office Action, the Examiner rejected independent claims 1, 36, 46, 56, and 65 under 35 U.S.C. 102(e) based on Matsuyama. Applicant has reviewed Matsuyama, and respectfully submits that Matsuyama does not teach various limitations recited in the rejected claims.

In Matsuyama, the input device (200 in Figures 2 and 3) is a device specifically designed for the system. In particular, the LED unit (53 in Figure 1; and 201 in Figure 3) in the input device (200) is detected by light detectors (61a and 61b in Figure 1; and 102a and 102b in Figure 2) mounted to the base of the system. Signals from the light detectors (102a, 102b) are used to determine the relative position of the input device (200) with respect to the base of the system. Similarly, the acceleration sensor (54 in Figure 1; and 202 in Figure 3) provides a signal to the ADC (71 in Figure 1) which converts an analog signal from the acceleration sensor to a digital signal to be used by the control section (1 in Figure 1).

In Matsuyama, signals from the LED and acceleration sensor, as well as signals from the light detectors and the ADC, are all specifically designed as part of the system. Hence, Matsuyama’s input device is a direct and dedicated input device. Matsuyama does not teach a second input device that is different from a first input device. Consequently, Matsuyama neither teaches the second input device having a second data format, nor the concept of converting the second data format to the first format associated with the first input device.

In contrast, the present application addresses a second input device that is different than a first input device. Typically, the first input device is either a dedicated device, or a device for which a given computer application was designed for. In a non-limiting example, a typical dedicated gaming platform has a hand-held controller which is a dedicated input device that is either a factory OEM or an aftermarket part. In another non-limiting example, many computer-based games are designed to receive inputs from input devices such as a mouse or a joystick.

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Thus, these devices are non-limiting examples of the first input device. The input device disclosed in Matsuyama is also a first input device that is dedicated to its system.

The rejected independent claims of the present application include limitations that are neither disclosed nor suggested in Matsuyama. These limitations are summarized as follows.

Claim 1 includes a limitation of a second input device that is different than the first input device. Claim 1 further includes a limitation of the second input device having a second data format that is different than the first data format of the first input device. Claim 1 further includes a limitation where the second input device data is converted to the first format to simulate the first input device data, thereby allowing the second input device to simulate the first input device for the computer application.

Claim 36 includes a limitation of creating a second input device data having a second format different than the first format of the first input device. Claim 36 further includes a limitation of converting the second input data into a simulated first input device data having the first format.

Claim 46 includes a limitation of a means for creating second input device data having a second format different than the first format of the first input device. Claim 46 further includes a limitation of a means for converting the second input data into a simulated first input device data having the first format.

Claim 56 includes a limitation of creating an electronic signal having a second format different from the first format of the first input device. Claim 56 further includes a limitation of translating the electronic signal into replicated first input device data having the first format.

Claim 65 includes a limitation of translating a signal having a format incompatible with the computer application, into an input device data having a format that is compatible.

Based on the foregoing, Applicant respectfully submits that independent claims 1, 36, 46, 56, and 65 are not anticipated by Matsuyama. Applicant further submits that the rejected dependent claims include additional limitations, and thus are patentable for at least the foregoing reasons.

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**Rejections Under 35 U.S.C. 103(a) Based on Matsuyama**

In the discussion above, Applicant has described a fundamental difference between the present application and Matsuyama. Applicant respectfully submits that 42, 52, 62, or any other pending claim are neither disclosed nor suggested by Matsuyama. Thus, Applicant respectfully requests that obviousness-based rejections based on Matsuyama be withdrawn.

**Rejections Under 35 U.S.C. 103(a) Based on Matsuyama In View of Woolston, Yasue, Childs, and/or Lum**

Applicant notes that none on Woolston, Yasue, Childs, and/or Lum, alone or in combination with Matsuyama, teaches or suggests the combinations of limitations recited in the rejected claims. Matsuyama has been shown to be a reference that does not anticipate or make obvious the claims of the present application. Woolston teaches a wireless link for a video game, but in no way suggests the combinations of limitations in the rejected claims. Yasue teaches a processor configured to assemble data into data frames, but in no way suggests the combinations of limitations in the rejected claims. Childs teaches a software that is configured to receive certain amount of data at a given time, but in no way suggests the combinations of limitations in the rejected claims. Lum teaches a processor having a first and a second mode, but in no way suggests the combinations of limitations in the rejected claims. Thus, Applicant respectfully requests that obviousness-based rejections based on Matsuyama in view of Woolston, Yasue, Childs, or Lum be withdrawn.

**Summary**

For the foregoing reasons, Applicant believes that this Application is now in a condition ready for allowance and respectfully requests the prompt allowance of the same. Should there be any impediment to the allowance of this application that could be resolved by a telephone call, the Examiner is respectfully requested to call the undersigned at the telephone number shown below.


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Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: 11-23-05

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AMEND

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